

COLSF
Colbert 7.3 VI



STINE O GREGOIRE
Director

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 19, 1989

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SUPERFUND BRANCH

Mr. Dean Fowler
Colbert Landfill Project Manager
Spokane County Public Works
N. 811 Jefferson Street
Spokane, Washington 99260-0180

RE: Comments on the Draft Colbert Landfill Health and Safety Plan

Dear Dean:

This letter is to provide you comments from both Ecology and EPA regarding Landau Associates "Draft Health and Safety Plan for the Colbert Landfill Remedial Design/Remedial Action." In general, the plan is very well written and thorough, but we do have the following comments. As you can see from the comments, most are only minor issues. Once these comments are incorporated into the final plan, Ecology and EPA find the Health and Safety (H&S) Plan to be "acceptable." Due to liability constraints, we are unable to "approve" the Health and Safety Plan.

Our comments are as follows, by page number:

Page 1. Under EMERGENCY CONTACTS, include the Ecology Office in Spokane for spills. Their 24 hour number is (509)456-2926.

Page HS-1-4 Line 11 add: The ROD summary for the Colbert....

Page HS-1-5 Line 6 add: ...(Tables I-1, IV-1 and V-1).

" " " " Line 17 add: ...be within the plumes and just outside of the refuse disposal area:

Page HS-1-6 Line 5 add: ...Plan will be revised (if appropriate) to reflect...

Page HS-1-8 Lines 4 & 5 add: ...upper and lower aquifers, respectively, which covers approximately "X" acres.

Page HS-1-8 Line 16: ...visitors entering the Site must adhere...
The "Site" is too broad of a definition. Maybe you could use "Site work zones" or something similar.

Page HS-1-12 Line 4 add: ...with my supervisor and/or the Site Safety Officer, and I understand the requirements.

USEPA SF



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Page HS-2-1: This section mentions a physical hazard of rattlesnakes. There needs to be a short discussion of the treatment for rattlesnake bite in this section of the plan.

Page HS-2-8 Line 2: PCE has an odor similar to ether or chloroform which smells like what? for those who do not know those smells.

Page HS-2-10 Line 16 add: (i.e., gas electrical, water, and sewer lines).

Page HS-2-10 Section 2.4: You should add a statement that if extreme hot weather is encountered at the Site, field activities may be suspended until more normal weather returns.

Page HS-2-10 Section 2.4: A statement should be added which says that if heat stroke is suspected, immediate medical attention should be sought. Also, regarding heat stroke, the EPA "Personnel Protection and Safety" manual notes that the victim should be cooled "...but not too rapidly..." First aid treatment for heat stroke is evolving. Make sure that you include the most recent treatment information, whatever that may be.

Page HS-2-10 Section 2.4: Mention should be made of "heat cramps" along with the treatment.

Pg HS-2-14 Section 2.5: As above, you should add a statement regarding extreme cold weather and possible delay of field activities.

Page HS-2-17 Line 21 add: Fire extinguishing equipment will be available and easily accessible on each drill rig...

Page HS-5-1 Line 22 add: ...necessary for this project, at this time. If significant concentrations of volatile organic compounds are indicated by the photoionization detector, other field monitoring equipment (eg. detector tubes) will be used to ensure that methylene chloride is not present in concentrations approaching the PEL. This is an important consideration because air purifying respirators are not considered adequate protection against MC due to its poor warning properties. I agree that the likelihood of finding high concentrations of MC is very small, but it is worth the mention.

Page HS-5-2 Line 11 add: The calibration of the photoionization meter and CGI will be checked each morning,...

Page HS-7-3 Line 7 add: ...detergent solution followed by several clear rinses, then hung to dry. If not thoroughly rinsed, the detergent may cause skin irritation and/or rash.

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Page HS-7-5 Line 4 add: ...cuttings will be considered non-hazardous and may be disposed of at the work site, if appropriate, or in the refuse disposal area.

Page HS-8-3 Section 8.3 Bullet #2 add: Check location of portable first aid kit, two-way radio, fire extinguisher, and water supply;

Page HS-9-1: There needs to be a paragraph that wind direction indicators will be erected at each work area, so in an emergency, workers will know which way is upwind. The wind direction indicator can be a strip of survey tape on a stick or tied to the mast of the drill rig.

Page HS-9-1 Section 9.1.4: Attached to this comment letter are the visual presentations of the international hand and arm signals. Some of these may be useful to include in the manual, especially numbers 1,2,5,9, and 10. Also, (Page HS-9-2) the hand signal for "Exit exclusion zone" is "Hands on Waist" not on "Wrist."

Page HS-9-4 Section 9.6 The Washington State Department of Labor and Industries also needs to be notified of work related accidents.

Page HS-9-6 Add/Clarify: The information provided in the "Employee Exposure/Injury Incident Report" is not to be released under any circumstances to parties other than those listed in this section, bona fide emergency response team members, or regulatory agency personnel.

If you have any questions regarding the above comments on the Draft Health and Safety Plan, please give me a call at (206)438-3043. Ecology and EPA are in the process of reviewing the "Draft Quality Assurance Project Plan" and the "Draft Phase I Groundwater Monitoring Well Construction Plan." We should be done with our review of those two plans fairly soon.

Sincerely,

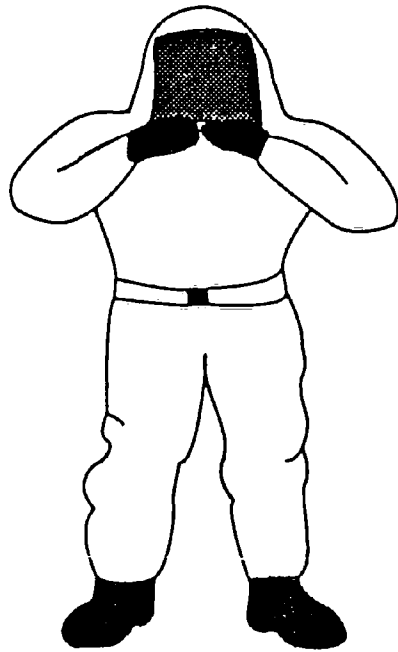
Mike Blum

Mike Blum, Site Manager
Landfill Cleanup Section
Hazardous Waste Investigations and
Cleanup Program

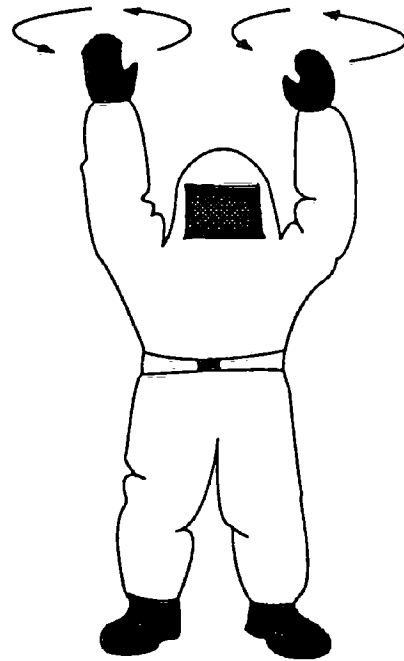
MB:clr

cc: Larry Beard, Landau Associates
Neil Thompson, EPA

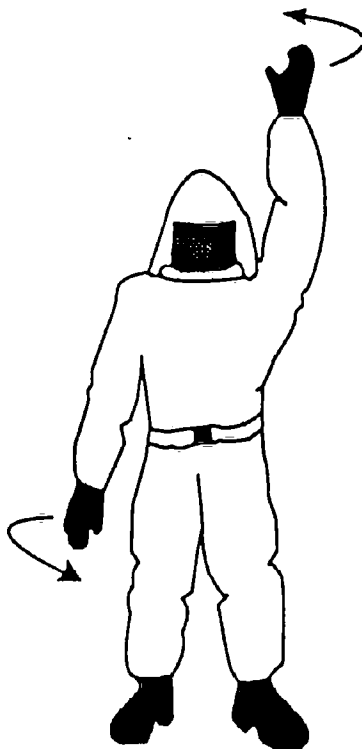
APPENDIX V - 3
INTERNATIONAL HAND AND ARM SIGNALS



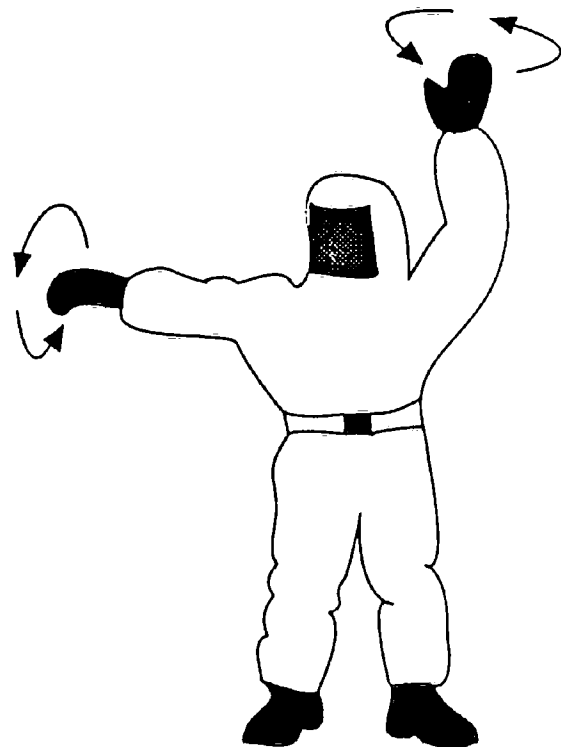
1. OUT OF AIR,
CANNOT BREATHE



2. NEED ASSISTANCE
(HELP GETTING OUT)

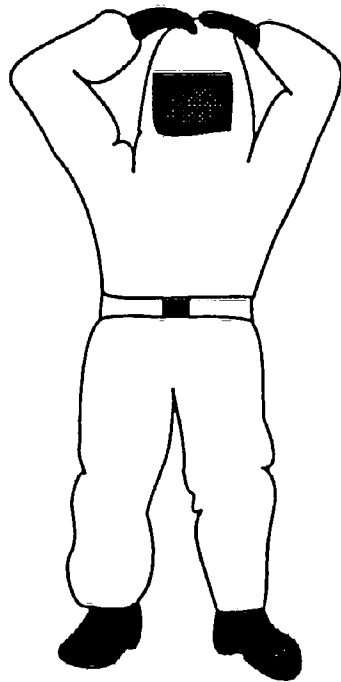


3. BODY RECOVERY

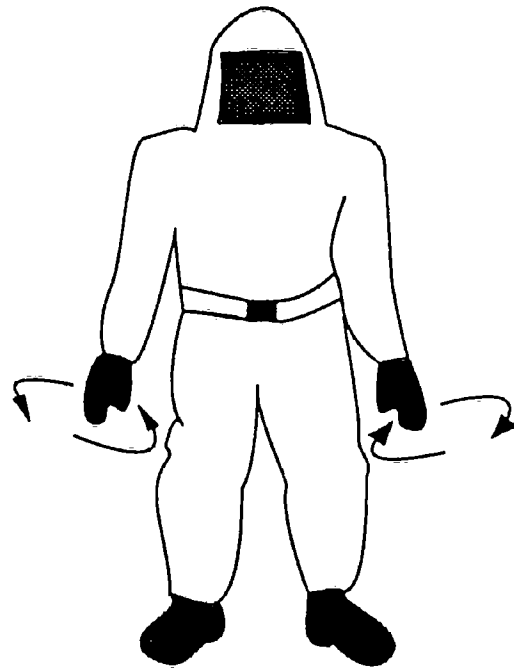


4. ADDITIONAL PERSONNEL
TO HELP WITH REPAIRS

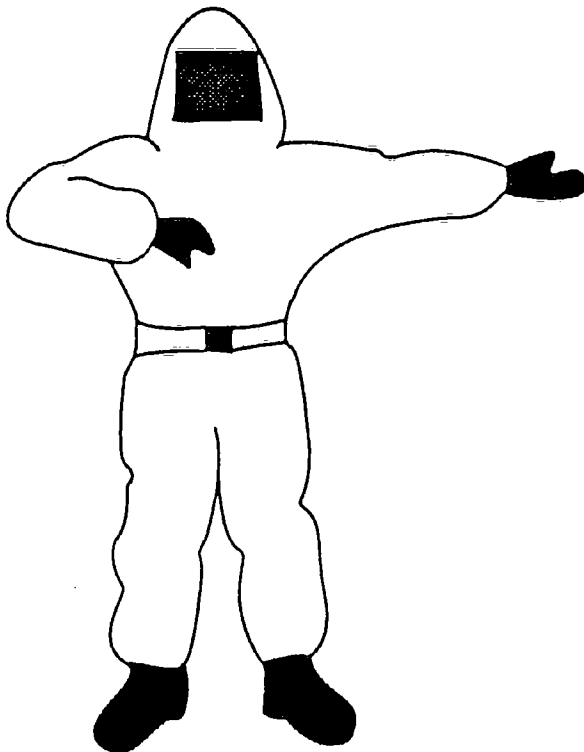
APPENDIX V - 3
INTERNATIONAL HAND AND ARM SIGNALS



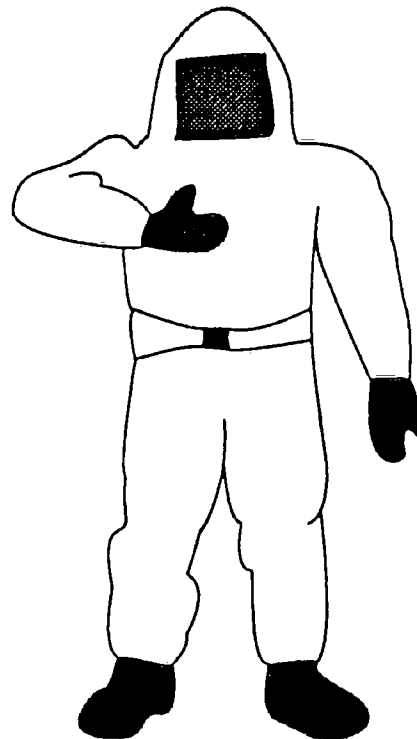
5. RETURNING TO
COMMAND STATION



6. SITUATION GRAVE,
EVACUATE IMMEDIATELY

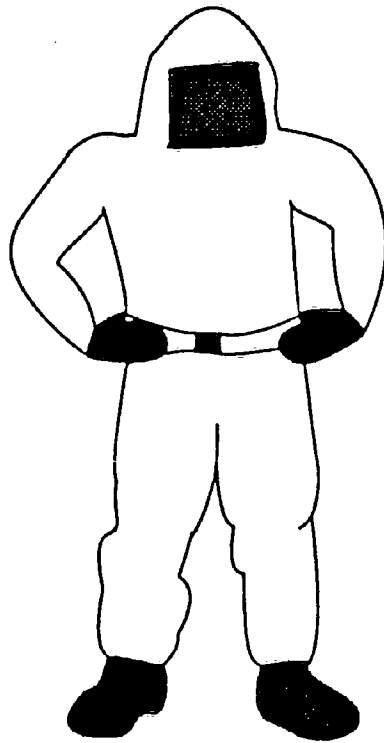


7. ACTIVITIES CANNOT BE COMPLETED
WITH REMAINING AIR SUPPLY

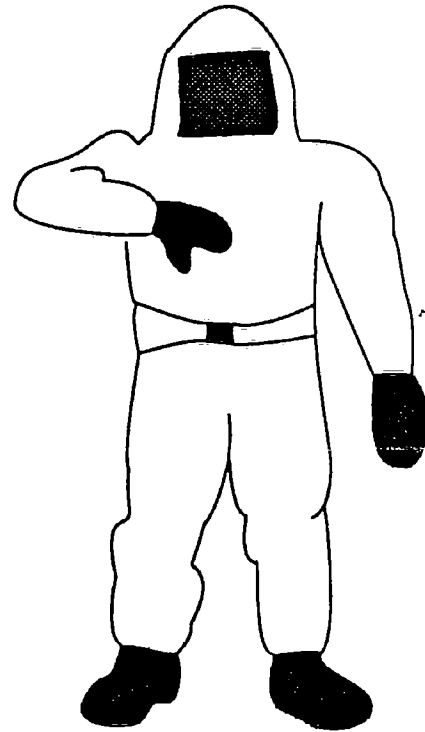


8. OK, I'M ALLRIGHT
or I UNDERSTAND

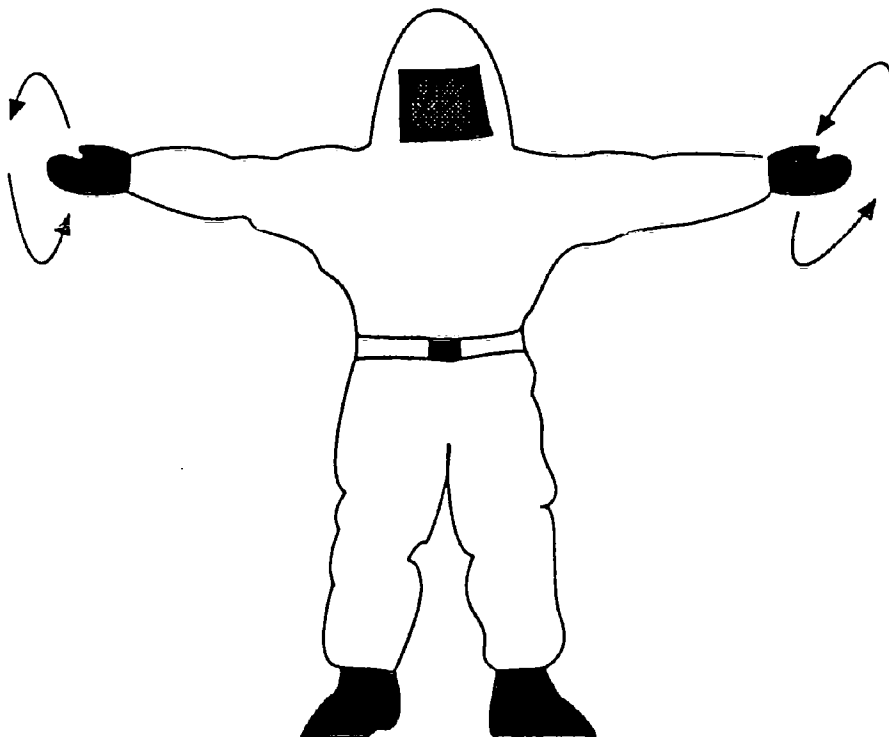
APPENDIX V - 3
INTERNATIONAL HAND AND ARM SIGNALS



9. LEAVE AREA
IMEDIATELY NO DEBATE



10. NO, NEGATIVE



11. SITUATION
UNDER CONTROL